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January 11, 2016

ELECTRONICALLY FILED

The Honorable Charles R. Breyer
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
450 Golden Gate Avenue
San Francisco, California 94102

Re: *Volkswagen "Clean Diesel" Litigation, MDL No. 2672 CRB*

Dear Judge Breyer:

In accordance with the Court's Order of December 22, 2015 (Doc. 336), I am respectfully requesting that the Court appoint me to serve as a member on one or more of the Plaintiffs' Steering Committees. In support of my application, I state to the Court that I have experience serving as class counsel in multiple-plaintiff litigation and further offer the following:

- 1. Professional experience in this type of litigation, including MDL experience as lead or liason counsel and/or service on plaintiffs' committees or subcommittees.**

I have been in private practice for over 23 years and have extensive experience in complex litigation, with an emphasis on products liability, federal employment law, and consumer protection claims in federal court. I have served as lead counsel in numerous cases in federal court and have handled multiple-plaintiff cases at the trial level and on appeal to the United States Court of Appeals for the Eleventh Circuit. In cases involving the Fair Labor Standards Act, I have been permitted by the Court to send notices to putative class members, to include on a potential nationwide class basis. An overview of my educational background and professional experience is set forth in my curriculum vitae, a copy of which is attached as Exhibit "A."

- 2. Names and contact information for the judges before whom I have appeared in matters discussed, *supra*.**

415 CHURCH STREET SUITE E-4 HUNTSVILLE, ALABAMA 35801 P 256.534.3288 F 256.534.3283

The Honorable Charles R. Breyer
January 11, 2016
Page 2

Hon. Virginia Emerson Hopkins

United States District Court for the Northern District of Alabama
1729 5th Avenue, North
Birmingham, AL 35203-2000
205-278-1950
(FLSA Multiple-Plaintiff Litigation)

Hon. U. W. Clemon

United States District Court, Northern District of Alabama (retired)
White Arnold & Dowd P.C.
2025 Third Avenue North, Suite 500
Birmingham, AL 35203
(205) 323-1888
(FLSA Multiple-Plaintiff Litigation and Title VII of the Civil Rights Act of 1964)

Hon. C. Lynwood Smith

United States District Court, Northern District of Alabama
101 Holmes Ave., N.E.
Huntsville, AL 35801
(256) 533-9490
(Multiple-Plaintiff Whistleblower Protection Act Claims, Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act, and Age Discrimination in Employment Act)

3. Willingness and ability to immediately commit to time-consuming litigation.

I am committed to this litigation and will invest the time and experience necessary to bring this litigation to a conclusion that is in the best interest of my clients, as well as others who are pursuing similar claims.

4. Willingness and ability to work cooperatively with other plaintiffs' counsel and defense counsel.

I am willing to work with and have litigated numerous cases with associated firms.

The Honorable Charles R. Breyer

January 11, 2016

Page 3

5. Access to resources to prosecute the litigation in a timely manner.

I will invest the financial resources necessary to bring this litigation to a conclusion that is in the best interest of my clients, as well as others who are pursuing similar claims.

6. Willingness to serve as lead counsel, a member of a steering committee, or both.

I am willing to serve in any capacity that the Court might deem beneficial in this litigation. I am willing to work in any of the various categories identified in the Court's Orders, to include vehicle owners, lessees, dealerships, or all plaintiffs. I believe that I am best suited to be a member of a steering committee.

7. The particular category or categories of plaintiffs the applicant wants to specifically represent.

I am willing to work in any of the various categories identified in the Court's Orders, to include vehicle owners, lessees, dealerships, or all plaintiffs. Please see response to 6, *supra*.

8. Any other considerations that qualify counsel for a leadership position.

I understand that several attorneys have submitted applications to be appointed Class Counsel or appointed to one or more Steering Committees. I also realize that most of them have more experience than me handling similar cases. I do, however, believe that my experience would be beneficial to the Court and the many individuals who have a vested interest in the outcome of these proceedings. I further apologize for the untimely submission of this application. There was a communication problem in our office. It has been resolved. Thank you for considering my application.

Sincerely,



Bradley P. Ryder